

SINCLAIR

BROADCAST GROUP

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

January 27, 2017

Re: MB Docket No. 16-410
Internet Sources for FCC EEO Recruitment Requirements

Dear Ms. Dortch:

Sinclair Broadcast Group, Inc. (“Sinclair”) hereby submits these comments in response to the Media Bureau’s December 15, 2016, Public Notice (“PN”)¹ regarding the use of internet sources for FCC Equal Employment Opportunity (“EEO”) recruitment requirements. Sinclair joins Sun Valley Radio Inc. and Canyon Media Corporation (the “Petitioners”) in their request for the Commission to revise the current EEO recruitment requirements to include internet only advertising as a compliance option.

As the Petitioners note, the current EEO recruitment requirements were set in 2002, at which time the Commission decided that the internet was not widespread enough to be the primary tool for applicants seeking employment. Over a decade later, this policy is outdated and warrants reconsideration by the Commission.

With the advancement of the internet and creation of sites such as LinkedIn and Glassdoor, job applicants are increasingly taking their search for employment online. As the petition states, “job seekers and employers alike rely on the Internet as a primary recruiting/jobseeking [sic] tool.” Allowing broadcasters to rely on the internet to share and promote employment opportunities will enable them to capitalize on existing technologies and reach job-seekers online, where they are already engaged.

Requiring broadcasters to continue to promote jobs through outdated mediums such as classified ads is an unnecessary burden, and one which should be revisited in the digital age. Further, punishing broadcasters for focusing their recruitment efforts online in lieu of less popular methods is counter-productive and only hinders their ability to ensure that job vacancy information is widely disseminated.

Respectfully submitted,

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Rebecca Hanson
SVP, Strategy and Policy

¹¹ *Media Bureau Seeks Comment on Petition for Rulemaking Seeking to Allow the Sole Use of Internet Sources for FCC EEO Recruitment Requirements* MB Docket No. 16-410, DA 16-1391